

1 **MICHAEL MEE, ESQ**
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LIBERATORS CRIMINAL DEFENSE
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Attorney for Defendant

5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

7 UNITED STATES OF AMERICA,
8 Plaintiff,
9 v.
10 JAVIER GIOVANNI REYES RINCON,
11 Defendant.

Case No. 2:20-mj-000862-EJY

12 **STIPULATION TO VACATE BENCH**
13 **TRIAL AND SET FOR ENTRY OF**
14 **PLEA AT A LATER DATE**

15 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
16 Chiou, Acting United States Attorney, and Joshua Brister, Assistant United States
17 Attorney, counsel for the United States of America, Michael Mee, Esq., counsel for the
18 defendant, that the bench trial in the above-captioned matter, currently scheduled for June
19 22, 2022 at the hour of 9:00 a.m., be vacated, and the matter be re-set for an Entry of Plea
hearing for a period of approximately 60 days, to a date and time of the Court's
convenience.

20 This stipulation is entered into for the following reasons:

- 21 1. Defendant is out of custody and agrees to the continuance.
22 2. That undersigned counsel Michael Mee was retained on January 21, 2022, and
initially indicated that he expected to be able to proceed to trial in this case with
a ninety (90) day extension, which this Court then Ordered. That undersigned

1 counsel obtained a subsequent extension of time for the bench trial due to, in
2 part, the fact that his daughter was in the hospital in intensive care.

- 3 3. That since then, the parties have entered into a plea agreement, signed by the
4 Defendant, counsel for the Government, and counsel for the Defendant, and as
5 such there will be no bench trial held in this matter.
- 6 4. That the parties intended to conduct the Entry of Plea on June 22, 2022,
7 however, Mr. Mee's daughter is in the process of being transferred to a hospital
8 in Philadelphia for specialized treatment and is scheduled for a surgical
9 procedure on June 22, 2022.
- 10 5. That on this basis, Mr. Mee requested that the Trial date be vacated, and the
11 matter be re-set for an Entry of Plea at a later date, to which counsel for the
12 Government has graciously agreed to request by stipulation.
- 13 6. That therefore the parties stipulate and request that this Continuance be granted
14 by the Court, that trial be vacated, and that the Entry of Plea hearing be
15 scheduled for a later date approximately 60 days from now, to a date and time
16 of the Court's convenience.

17 DATED this 20th day of June, 2022.

DATED this 20th day of June, 2022.

18 /s/ Michael Mee, Esq.

19 MICHAEL MEE, ESQ
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20 /s/ Joshua Brister
JOSHUA BRISTER
Assistant United States Attorney
CHRISTOPHER CHIOU
Acting United States Attorney
Attorneys for Plaintiff

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JAVIER GIOVANNI REYES RINCON,

7 Defendant.

8 Case No. 2:20-mj-00862-EJY

9
10 **Order Vacating Bench Trial and Setting**
11 **Hearing for Entry of Plea**

12 Based on the pending stipulation of counsel, and good cause appearing therefore,

13 IT IS HEREBY ORDERED that the bench trial in the above-captioned matter

14 currently scheduled for June 22, 2022, at the hour of 9:00 a.m. be vacated, and that this

15 matter shall come before this Court for an Entry of Plea hearing on the date of July 27,

16 2022, at the hour of 9:00 a.m. in Courtroom 3D.

17 DATED this 21st day of June, 2022.

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20 UNITED STATES MAGISTRATE JUDGE